

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

VISHAL SHAH, individually and on behalf of all  
others similarly situated,

Plaintiff,

v.

YOUNG LEE GROUP, LLC

Defendant.

Case No. 1:25-cv-06904

**CLASS ACTION COMPLAINT**

**MOTION FOR EXTENSION OF TIME  
TO RESPOND TO THE COMPLAINT AND FILE INITIAL STATUS REPORT**

Plaintiff, Vishal Shah with the consent of the Defendant Young Lee Group, LLC<sup>1</sup>  
(collectively, the "Parties"), respectfully move this Court for a 30-day extension of time to (1)  
file Defendant's response to the Complaint and (2) file the Joint Initial Status Report. In support  
of this Motion, the Parties state as follows:

1. Plaintiff filed the Complaint in June of 2025.
2. The Parties' Joint Initial Status Report are currently due on July 30, 2025.
3. The Parties are engaged in ongoing discussions regarding a potential resolution of this  
matter.

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<sup>1</sup> The Defendant has retained counsel, but have not yet filed an appearance.

4. The requested extension will allow the Parties to continue these discussions and potentially avoid the need for further litigation, thereby conserving judicial and party resources.
5. This is the first request for an extension of these deadlines, and the request is made in good faith and not for purposes of delay.

WHEREFORE, the Parties respectfully request that the Court extend the deadline to respond to the Complaint and the deadline to file the Joint Initial Status Report by 30 days, making both due on August 28, 2025.

Dated: July 28, 2025

PLAINTIFF, on behalf of himself  
and others similarly situated,

/s/ Anthony Paronich

Anthony Paronich

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